

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE JAKKS PACIFIC, INC. SHAREHOLDERS
CLASS ACTION LITIGATION

Case No. 04-CV-8807 (KMK)

**NOTICE OF MOTION OF QUANTUM
EQUITIES LLC AND FRANK WHITING FOR APPOINTMENT AS
LEAD PLAINTIFF AND APPROVAL OF SELECTION OF LEAD COUNSEL**

PLEASE TAKE NOTICE that class members Quantum Equities LLC and Frank Whiting will hereby move this Court at 10am on March 11, 2005, for an Order (attached hereto as Exhibit A) (i) appointing Quantum Equities LLC and Frank Whiting as Lead Plaintiff, pursuant to Section 21D of the Securities Exchange Act of 1934 (the "1934 Act"), as amended by the Private Securities Litigation Reform Act of 1995 (the "PSLRA"); and (ii) approving Lead Plaintiff's selection of Wolf Haldenstein Adler Freeman & Herz LLP as Lead Counsel for the Class.

DATED: February 1, 2005
New York, New York

Respectfully submitted,

**WOLF HALDENSTEIN ADLER
FREEMAN & HERZ LLP**

By: /s/ Gustavo Bruckner

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Additional Plaintiff's Counsel

CERTIFICATE OF SERVICE

I, Gustavo Bruckner, hereby certify that on February 1, 2005, I caused a true and correct copy of:

- the Notice of Motion of Quantum Equities LLC and Frank Whiting for Appointment as Lead Plaintiff and Approval of Selection of Lead Counsel;
- the Motion of Quantum Equities LLC and Frank Whiting for Appointment as Lead Plaintiff and Approval of Selection of Lead Counsel;
- the Memorandum of Law in Support of the Motion of Quantum Equities LLC and Frank Whiting for Appointment as Lead Plaintiff and Approval of Selection of Lead Counsel;
- and the Declaration of Gustavo Bruckner in Support of the Motion of Quantum Equities LLC and Frank Whiting for Appointment as Lead Plaintiff and Approval of Selection of Lead Counsel;

to be served (i) electronically on all counsel registered for electronic service for this case; and (ii) by first-class mail to all additional counsel listed below.

/S/

Gustavo Bruckner

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[PROPOSED] ORDER

Having considered the Motion of Quantum Equities LLC and Frank Whiting for Appointment as Lead Plaintiff, and Approval of Selection of Lead Counsel, and the Memorandum of Law and Declaration of Gustavo Bruckner, Esq. in support thereof, and good cause appearing therefor:

APPOINTMENT OF LEAD PLAINTIFF AND LEAD COUNSEL

1. Quantum Equities LLC and Frank Whiting are appointed as Lead Plaintiff pursuant to 15 U.S.C. § 78u-4(a)(3)(B).
2. The law firm of Wolf Haldenstein Adler Freeman & Herz LLP is hereby appointed Lead Counsel.
3. With the approval of the Court, Lead Counsel shall assume and exercise the following powers and responsibilities:
 - a. To coordinate the briefing and argument of motions;
 - b. To coordinate the conduct of written discovery proceedings;
 - c. To coordinate the examination of witnesses in depositions;
 - d. To coordinate the selection of counsel to act as spokesperson at pre-trial conferences;
 - e. To call meetings of the plaintiffs' counsel as they deem necessary and

appropriate from time to time;

- f. To conduct all settlement negotiations with counsel for the defendants;
- g. To coordinate and direct the preparation for trial, and the trial of this matter and to delegate work responsibilities to selected counsel as may be required;
- h. To receive orders, notices, correspondence and telephones calls from the Court on behalf of all plaintiffs, and to transmit copies of such telephone calls to plaintiffs' counsel; and
- i. To supervise any other matters concerning the prosecution or resolution of the action.

4. With respect to scheduling and/or procedural matters, defendants' counsel may rely upon all agreements with Lead Counsel.

5. No pleadings or other papers shall be filed or discovery conducted by any plaintiff except as directed or undertaken by Lead Counsel.

6. Counsel in any related action that is consolidated with this Action shall be bound by this organizational structure of plaintiffs' counsel.

SERVICE OF PLEADINGS AND OTHER PARTIES

1. Service by the defendants on plaintiffs of any papers shall be deemed to be complete for all purposes when a copy is served on Lead Counsel.

IT IS SO ORDERED.

DATED: _____

U.S.D.J.